

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

UNKNOWN PARTY,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE NO.: 1:23-cv-00223

HON. HALA Y. JARBOU

**MOTION TO ALLOW REMOTE APPEARANCE BY DEFENDANT JAMES JACKSON
AND LUCAS JACKSON FOR HEARING ON OCTOBER 11, 2023**

NOW COMES Defendants, James Jackson and Lucas Jackson, and does hereby motion this Court to allow Defendants James Jackson and Lucas Jackson to appear virtually or telephonically for the October 11, 2023 hearing and so state:

1. Attorney Michelle M. McLean (P71393) and the law firm Bolhouse, Hofstee, & McLean PC (hereafter “Legal Counsel”) represent Defendant James Jackson and Defendant Lucas Jackson (hereafter, “the Jackson Defendants”).
2. On October 2, 2023, Legal Counsel filed a Motion to Withdraw their representation of the Jackson Defendants. (ECF).
3. This Court set this matter on for a hearing on October 11, 2023 and ordered the Jackson Defendants to personally appear in Lansing, MI for the hearing.
4. The Jackson Defendants stipulate to allow Legal Counsel to withdraw. See **Exhibit A and Exhibit B-Affidavits of Defendants James Jackson and Lucas Jackson.**

5. The Jackson Defendants are unable to afford continued legal representation, and cannot afford to pay for air fare, hotel, transportation, etc. to appear in Michigan as the same presents them with an additional financial hardship. (Ex. A; Ex. B).

6. The Jackson Defendants reside in Bar Harbor, Washington and have not come to Michigan since a childhood vacation long ago.

7. The Jackson Defendants request that they be allowed to appear virtually for the hearing either via Zoom or by telephone.

WHEREFORE, the Jackson Defendants pray that the Court will allow them to appear remotely to avoid the cost of travel since they are without the means to accomplish the trip.

Dated: October 3, 2023

Respectfully submitted,

Michelle M. McLean

Michelle M. McLean (P71393)

Attorneys for Defendants
James Jackson and Lucas Jackson

CERTIFICATION OF CONFERRING WITH OPPOSING COUNSEL

On October 3, 2023 the undersigned counsel emailed Plaintiff's attorneys of record seeking a concurrence in this relief. Plaintiff's attorneys indicated that they do not oppose the relief requested.

Respectfully submitted,

Dated: October 3, 2023

Michelle M. McLean
Michelle M. McLean (P71393)

Attorneys for Defendants James Jackson and Lucas Jackson